

KBO

Branislav Pales [Claim No. 16913]

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

May 10, 2025

United States Bankruptcy Court

824 North Market Street, 3rd Floor

Wilmington, Delaware 19801

Re: Case No. 22-11068 (KBO), FTX Trading Ltd., et al.

Response to FTX Recovery Trust's One Hundred Sixty-Fourth Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) [D.I. 30302]

Dear Honorable Karen B. Owens,

I am writing in response to the FTX Recovery Trust's One Hundred Sixty-Fourth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) filed on April 28, 2025 [D.I. 30302] (the "Objection"). As a claimant whose proof of claim is subject to this Objection, I respectfully object to the proposed reduction or disallowance of my claim and request that the Court deny the relief sought by the FTX Recovery Trust for the reasons set forth below.

1. Accuracy of Claim Amount: My proof of claim, filed as [Claim Number, if known], accurately reflects the funds I held in my FTX account as of the petition date, including 188 tokens of DOT and 16 tokens of BCH. The claim is supported by account statements, transaction records, and other documentation, which I am

prepared to provide for the Court's review. The Objection's assertion that my claim is overstated is incorrect, as it fails to account for these specific assets and their respective values as recorded in my account.

2. Lack of Specificity in the Objection: The Objection does not provide sufficient detail to justify the reduction or disallowance of my claim, particularly with respect to the proposed reduction of my assets, which includes 188 tokens of DOT and 16 tokens of BCH. It broadly categorizes claims as "overstated" without identifying specific discrepancies or providing evidence to support the FTX Recovery Trust's position. This lack of particularity deprives me of the ability to adequately address the alleged issues with my claim.

3. Request for Additional Information: If the FTX Recovery Trust possesses specific evidence or calculations supporting their Objection to my claim, including the proposed reduction of 188 tokens of DOT and 16 tokens of BCH, I respectfully request that such information be provided to me promptly so that I may review and respond to it. Alternatively, I request a reasonable opportunity to engage with the FTX Recovery Trust to reconcile any purported discrepancies.

4. Reliance on FTX's Representations: My claim, including the 188 tokens of DOT and 16 tokens of BCH, is based on the account balance information provided by FTX's platform, which I relied upon in good faith. If there are errors in the platform's data, such errors are attributable to the Debtors' systems and should not prejudice my claim.

In light of the foregoing, I respectfully request that the Court deny the FTX Recovery Trust's Objection with respect to my claim and allow my proof of claim in its entirety, including the 188 tokens of DOT and 16 tokens of BCH. I further request that the Court grant any additional relief deemed just and proper, including the opportunity to submit additional documentation or participate in a hearing to substantiate my claim.

A copy of this response has been served upon counsel for the FTX Recovery Trust, as listed below, via [method of service, e.g., first-class mail or email], on June 10, 2025, to ensure receipt by 4:00 p.m. (ET) on June 11, 2025:

Landis Rath & Cobb LLP Attn: Matthew R. Pierce 919 Market Street, Suite 1800
Wilmington, Delaware 19801

Email: pierce@lrclaw.com

Sullivan & Cromwell LLP Attn: Andrew G. Dietderich 125 Broad Street New York, NY
10004

Email: dietdericha@sullcrom.com

Thank you for your attention to this matter. I look forward to presenting my case at the hearing scheduled for June 25, 2025, at 9:30 a.m. (ET).

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Branislav Pales', with a stylized flourish at the end.

Branislav Pales

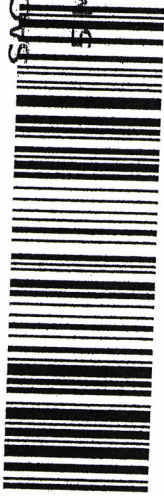
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95961



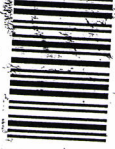
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